EXHIBIT 1

Exhibit 11

Sarah Prutzman

From:	Or Lenchner <or@brightdata.com>
Sent:	Friday, December 2, 2022 12:01 AM
To:	Maja Kieturakis; Allison Hendrix
Cc:	Mor Avisar; Sarah Prutzman; Gabriella Orem
Subject:	Re: Meta Data Policy meeting with Bright Data (time sensitive)

!--|

  This Message Is From an External Sender

|--!

Datasets were removed.

On 02-Dec-22 12:52 AM, Or Lenchner wrote:
> Hi Maja,
>
> Thanks for replying. I have instructed the team to not sell any data sets derived from Meta public-generated data to any third-party and we will remove them from our data set marketplace. As your reply was in a fairly late hour of the day (it's 1am here), it might take a few hours to complete.
>
> I will touch base tomorrow (my morning, just in a few hours) to verify it was done and to suggest next steps.
>
> Best,
>
> Or
>
> On 02-Dec-22 12:30 AM, Maja Kieturakis wrote:
>> Dear Or,
>>
>> Thank you for your prompt response. We are glad to hear that you
>> will immediately stop offering for sale and selling any Meta users' data while we try to reach an amicable resolution. We agree with your suggestion that we pause additional actions while we work on a resolution. To be clear though, your continued access and collection of data from Meta products and services is unauthorized and is a violation of Facebook's and Instagram's terms.
>>
>> In response to your request that we identify contracts that incorporate the Facebook Terms of Service, Instagram Terms of Use, and Meta Platform Terms, we direct you to the accounts you created on both platforms. Each set of Meta's terms is itself a binding contract that you accepted through your use of Meta's products and services. See generally Meta Platforms, Inc. v. BrandTotal Ltd., No. 20-cv-07182-JCS, 2022 U.S. Dist. LEXIS 100679 (N.D. Cal. May 27, 2022).
>>
>> As we discussed previously on our call, Meta's terms explicitly
>> prohibit selling, licensing, or purchasing any data obtained from Meta. They also prohibit accessing or collecting data from Facebook and Instagram through automated means, or facilitating such access or collection of data, without Meta's prior permission, which Bright Data does not have.
>>
>> You therefore have a contractual obligation to stop selling data

1

>> collected from Meta products and services, delete any such data, and cease scraping and facilitating others in scraping data from Meta products and services. Like you, we value our long standing partnership. However, we are committed to protecting users' data.

>>

>> Finally, while we appreciate the offer, we are not available for an in-person meeting in California but we would be happy to meet again via Zoom to continue this discussion.

>>

>> Best,

>> Maja

>>

>> --

>> --

>> --

>> --

>> --

>> --

>> --

>> --

>> --

>> --

>> --

>> --

>> --

>> --

>> -----------------------

>> *From:* Or Lenchner <or@brightdata.com>

>> *Sent:* Thursday, December 1, 2022 5:41 AM

>> *To:* Maja Kieturakis <majakieturakis@meta.com>; Allison Hendrix

>> <ahendrix@meta.com>

>> *Cc:* Mor Avisar <mora@brightdata.com>

>> *Subject:* Re: Meta Data Policy meeting with Bright Data (time

>> sensitive)

>>

>> !---|

>>   This Message Is From an External Sender

>>

>> |---!

>>

>> Dear Maja, Allison,

>>

>> Thanks for your call, and your follow-up email.

>>

>> In your email, you asked that Bright Data stop selling public data from the Meta family of websites, and to cease scraping such data going forward. You indicated that if we did not do so in the next 48 hours, you would initiate an enforcement action against Bright Data.

>>

>> As you know, Meta has long been a valued client of our proxy and

>> scraping services for at least the last six years. As such, we would very much like to find a path forward that works for both of our companies. 48 hours, however, does not provide sufficient time to find that path. We have a few requests for information to help us evaluate your claims, and we ask for little more time to do so.

>>

2

2022-12-02 - Email From Bright Data to Meta

>> We understand you are pointing to the Facebook Terms of Service, Instagram Terms of Use, and Meta Platform Terms, but we are not clear as to which "contractual agreements" you are relying on that incorporate such terms. Can you please identify each such contract? We would also like to understand the specific provisions of the Terms of Service (or any other contractual provisions) you believe we may have breached.
>>
>> To be clear, our questions are not intended to be antagonistic but rather to fully understand the scope of the issues you have raised so that we may investigate them. As you know, we take compliance with all legal and regulatory issues seriously; and while we believe we are in compliance, we do want to thoroughly investigate your claims.
>>
>> At the same time, we would like to have earnest discussions to see if we can find a mutually agreeable business solution. We understand that this will take time. As such, we propose a two-week standstill. During these two weeks – and without prejudice to either party – we will not sell any data sets derived from Meta public-generated data to any third-party and we will remove them from our data set marketplace.
>>
>> Based on the two companies' long-lasting successful partnership, we are convinced that we can reach an understanding that is mutually acceptable and will allow Bright Data to continue providing important services to Meta as well as to the public at large. We propose an in-person meeting between the parties, in California, in order to resolve Meta's concerns without compromising the vital services Bright Data provides to its customers. Bright Data is proud of its high ethical standards, which distinguishes it from its competitors in the industry. We believe we can jointly resolve any legitimate concerns through the in-person meeting.
>>
>> Please let us know if you agree to our proposed two-week "stand still" while we continue discussions and your availability for an in-person meeting.
>>
>> Thank you very much,
>>
>> Or
>>
>> On 29-Nov-22 10:08 PM, Or Lenchner wrote:
>>> Adding our counsel as FYI
>>>
>>> On 29-Nov-22 10:05 PM, Maja Kieturakis wrote:
>>>> *
>>>>
>>>> Hi Or and Rony,
>>>>
>>>> Thank you again for taking the time to meet with us.
>>>>
>>>>
>>>> As we discussed, it has come to our attention that Bright Data is selling and scraping data from Meta in violation of our terms.
>>>>
>>>> You mentioned that you need to consult with your legal teams, who
>>>> support you to ensure you operate in compliance with the law,
>>>> including in applicable jurisdictions. We explained that in
>>>> addition to compliance with any applicable law or regulation,
>>>> Bright Data must also adhere to its contractual agreements with
>>>> Meta. Specifically, Meta's Terms of Service prohibit the automated
>>>> access and collection of data without our prior authorization as
>>>> well as the sale, license or purchase of Meta users' data. (See,
>>>> https://www.facebook.com/legal/terms/plain_text_terms
>>>> <https://www.facebook.com/legal/terms/plain_text_terms>

3

>>>> <https://www.facebook.com/legal/terms/plain_text_terms
>>>> <https://www.facebook.com/legal/terms/plain_text_terms>>,
>>>> https://help.instagram.com/581066165581870
>>>> <https://help.instagram.com/581066165581870>,
>>>> https://developers.facebook.com/terms.)
>>>> <https://developers.facebook.com/terms.)>
>>>>
>>>>
>>>> As an immediate next step, please take the following actions within
>>>> the next 48 hours and confirm once you've done so:
>>>>
>>>>
>>>>   *
>>>>
>>>>   Remove and cease the selling of any user data obtained from
>>>> Meta's family of apps (ex:
https://urldefense.com/v3/__https://brightdata.com/products/datasets/instagram/accounts__;!!Bt8RZUm9aw!5-
9AGzuwLOTHp99uThUPCppnp_3XA8fMkrdC_AfdznLq77T_gu-0LC3sEV8e4M3Kn2mD6qOkOZ0$
<https://urldefense.com/v3/__https://brightdata.com/products/datasets/instagram/accounts__;!!Bt8RZUm9aw!5-
9AGzuwLOTHp99uThUPCppnp_3XA8fMkrdC_AfdznLq77T_gu-0LC3sEV8e4M3Kn2mD6qOkOZ0$
> <https://urldefense.com/v3/__https://brightdata.com/products/datasets/instagram/accounts__;!!Bt8RZUm9aw!5-
9AGzuwLOTHp99uThUPCppnp_3XA8fMkrdC_AfdznLq77T_gu-0LC3sEV8e4M3Kn2mD6qOkOZ0$ >).
>>>>
>>>>   *
>>>>
>>>>   Remove and disable any access to existing datasets of Meta users' data.
>>>>
>>>>   *
>>>>
>>>>   Stop scraping and facilitating the scraping of Meta users' data.
>>>>
>>>>
>>>> As discussed, refusal to cooperate within the deadline provided may
>>>> result in enforcement action which can include terminating our agreements with you, or any other action that we
consider to be appropriate.
>>>>
>>>>
>>>> Finally, we will have additional questions and requests in the near future, such as requiring that you stop
processing and delete Meta user data that you've improperly obtained and sold, but the immediate request is that you
take the above actions within the next 48 hours.
>>>>
>>>>
>>>> Thank you again for your prompt response and thank you in advance
>>>> for working with us to address the issues we've surfaced.
>>>>
>>>>
>>>> Maja
>>>>
>>>>
>>>> *
>>>> --
>>>> --

4

>>>> ---
>>>> ---
>>>> ---
>>>> ---
>>>> ---
>>>> ---
>>>> ---
>>>> ---
>>>> ---
>>>> ---
>>>> ---
>>>> ---
>>>> ---
>>>> *From:* Or Lenchner <or@brightdata.com>
>>>> *Sent:* Tuesday, November 29, 2022 1:23 AM
>>>> *To:* Allison Hendrix <ahendrix@meta.com>
>>>> *Cc:* Maja Kieturakis <majakieturakis@meta.com>; Rony Shalit
>>>> <ronys@brightdata.com>
>>>> *Subject:* Re: Meta Data Policy meeting with Bright Data (time
>>>> sensitive)
>>>>
>>>>
>>>>
>>>> Hi Allison,
>>>>
>>>> Great. I will take the call together with Rony Shalit, Bright Data's VP of Compliance (Cc).
>>>>
>>>> Nir and Ron (Bcc) are in the re:invent conference and won't be able to join.
>>>>
>>>> Once again, as you described this issue as "time sensitive", any
>>>> information you can give us before the call, will make this call
>>>> more valuable :)
>>>>
>>>> Talk to you soon.
>>>>
>>>> Best,
>>>>
>>>> Or
>>>>
>>>> On 29-Nov-22 8:22 AM, Allison Hendrix wrote:
>>>>> Hello Or,
>>>>>
>>>>> We can make 9pm Israel time work. Thank you for replying so quickly and for joining us late in your day. I am away from my computer, but confirming Maja or myself will send video conference details first thing tomorrow. We look forward to meeting with you all. Thank you again.
>>>>>
>>>>> Ali
>>>>>
>>>>> Sent from my iPhone
>>>>>
>>>>>> On Nov 28, 2022, at 10:09 PM, Or Lenchner <or@brightdata.com> wrote:
>>>>>>

5

>>>>>>

>>>>>> Hello Maja, Thanks for reaching out. I am available today, Israel

>>>>>> time, between 10am to 2:30pm, and after 9pm. If you can share

>>>>>> more information upfront it will be useful. Best, Or On November

>>>>>> 29, 2022 00:31:00 Maja Kieturakis <majakieturakis@ meta. com>

>>>>>> Hello Maja,

>>>>>>

>>>>>> Thanks for reaching out.

>>>>>>

>>>>>> I am available today, Israel time, between 10am to 2:30pm, and after 9pm.

>>>>>>

>>>>>> If you can share more information upfront it will be useful.

>>>>>>

>>>>>> Best,

>>>>>>

>>>>>> Or

>>>>>>

>>>>>> On November 29, 2022 00:31:00 Maja Kieturakis <majakieturakis@meta.com> wrote:

>>>>>>

>>>>>>> Hello Bright Data team!

>>>>>>>

>>>>>>> I hope you are well. My team manages Meta's Platform Terms. I am

>>>>>>> reaching out to request your availability for a meeting *tomorrow, November 29, 2022*to discuss a time sensitive matter related to the collection and use of data obtained from us. Please let us know all possible times that could work (we are located in the Pacific Time zone) and we'll schedule accordingly.

>>>>>>>

>>>>>>> Thank you in advance for your prompt attention and for

>>>>>>> prioritizing this meeting.

>>>>>>>

>>>>>>> My best,

>>>>>>> Maja Kieturakis

>>>>>>>

>>>>>>> **

>>>>>>>

>>>>>>> *

>>>>>>> <Outlook-A picture .png>

>>>>>>> *

>>>>>>>

>>>>>>>

>>>>>>>

>>>>>>> *Maja Kieturakis*

>>>>>>>

>>>>>>> Privacy and Data Policy Manager

>>>>>>>

>>>>>>> e: MajaKieturakis@meta.com

>>>>>>>

>>>>>>> 1 Hacker Way, Menlo Park, CA 94025

>>>>>>>

>>>>>>>

>>>>>>>

>>>>>>>

>>>>>>>

6

>>>>>>>
>>>>>>>
>>>>>>